

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

WALDYR PRADO AND
IGOR CORNELSEN,

Defendants.

**DECLARATION OF
MICHAEL E. GERTZMAN**

No. 15 Cr. 516

I, Michael E. Gertzman, pursuant to 28 U.S.C. § 1746 declare as follows under penalties of perjury:

1. I am an attorney duly admitted to practice before this Court, a Partner with the firm Paul, Weiss, Rifkind, Wharton & Garrison LLP, and counsel for Defendant Igor Cornelsen.

2. I submit this declaration in connection with Cornelsen's Motion to Dismiss the Indictment.

3. Attached as Exhibit A is an excerpt from the SEC's Complaint against Waldyr Prado, which was filed in *SEC v. Prado*, No. 12 Civ. 7094 (S.D.N.Y.), at ECF No. 1 (September 20, 2012).

4. Attached as Exhibit B is a copy of SEC attorney David S. Brown's Declaration in support of the SEC's motion for a temporary restraining order against Prado and three of its accompanying exhibits, which were filed in *SEC v. Prado*, No. 12 Civ. 7094 (S.D.N.Y.), at ECF Nos. 9, 9-2, 9-6, 9-8 (September 20, 2012).

5. Attached as Exhibit C are excerpts from the transcript of the deposition of Cornelsen taken by the SEC on May 3, 2012.

6. Attached as Exhibit D is a copy of the Final Judgment as to Defendant Igor Cornelsen, which was filed in *SEC v. Cornelsen*, 12 Civ. 8712 (S.D.N.Y.), at ECF No. 7 (December 11, 2012).

Dated: October 7, 2021
New York, New York

/s/ Michael E. Gertzman
Michael E. Gertzman